

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Garry Core :  
Debtor : BANKRUPTCY NO.: 19-18028-amc

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by his attorney, Brandon Perloff, Esq., by way of Response to Movant's motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. The averments set forth in the corresponding paragraph contain factual allegations contained in documents filed with the Court. The debtor does not attest to the veracity or authenticity of said documents.  
Admitted.
4. Denied. Movant's averment is a conclusion of law to which no response is required.
5. Admitted.
6. Neither affirmed, nor denied. Should there be a post-petition arrears, the debtor intends to promptly cure.
7. Denied. After a reasonable inquiry, the Debtor does not have the requisite knowledge to attest to the veracity of Movant's averment.
8. Should there be a post-petition arrears, the debtor intends to promptly cure any such arrears.
9. Denied. Movant's averment is a conclusion of law to which no response is required.
10. Movant's averment does not call for a response.

**WHEREFORE**, Debtor pray that the Movant's request for relief be denied.

Date: 5/28/2020

/s/ Brandon Perloff  
Brandon Perloff Esquire.  
Attorney for Debtor